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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

15 SONY CORPORATION,
16 Plaintiff,
17 v.
18
19 VIZIO INC.,
20 Defendant.

CASE NO. CV 08-01135-RGK (FMOx)

REQUEST FOR ORAL ARGUMENT

Magistrate Judge: Hon. Fernando M. Olguin

**Hearing: 10:00 A.M. on September 2,
2009, at 312 North Spring Street, Los
Angeles, California**

**DISCOVERY CUT-OFF DATE:
NOVEMBER 1, 2009**

**PRETRIAL CONFERENCE DATE:
JANUARY 10, 2010**

TRIAL DATE: JANUARY 26, 2010

1 TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 Please take notice that Plaintiff Sony Corporation ("Sony") hereby
3 respectfully requests and moves the Court to grant oral argument on Sony and Vizio
4 Inc.'s ("Vizio") Joint Stipulation Regarding Vizio, Inc.'s Motion to Compel Expert
5 Reports and Depositions, and to Compel Depositions of Sony Witnesses in the
6 United States.

7 Sony respectfully submits that oral argument would be beneficial to the Court
8 in ruling upon this motion because Vizio's Supplemental Memorandum contains
9 several misstatements and new arguments, and Sony will not have an opportunity to
10 rebut these new assertions in the absence of oral argument.

11 • Vizio contends Sony no longer debates that it must bring its Rule
12 30(b)(6) deponents to the Central District when, in fact, Sony has agreed to make its
13 30(b)(6) designees available in the United States where they reside.

14 • Vizio now requests that Sony be ordered to produce the "lead inventor"
15 of each patent for deposition in the United States as a 30(b)(6) witness, even though
16 it did not request such relief, let alone provide support for it, in the Joint Stipulation.
17 Moreover, Sony does not know what Vizio means by lead inventor in this context.

18 • Vizio erroneously contends Sony admits the parties met and conferred
19 pursuant to Local Rule 37-1 on the issue of locations for the depositions.

20 • Vizio faults Sony for not moving for a protective order when the parties
21 have barely begun the meet and confer process for such a motion. Vizio itself on
22 August 12, 2009—the same day it filed this motion—requested the parties meet and
23 confer to discuss deposition scheduling on August 19th or 20th. After Sony agreed to
24 meet on August 20th, Vizio said it was no longer available on that date.

25 Finally, Sony wishes to advise the Court that yesterday evening, Sony was
26 able to reserve rooms for depositions at the United States Embassy in Osaka, Japan
27 for the following dates: September 8-20, 22-30, and October 1 and 2, 2009. Sony
28 has confirmed that four of the nine Japan-based inventors are available for

1 deposition in Osaka during this period and Sony is presently investigating the
2 availability of the other Japan-based inventors for deposition at that time.

3 WHEREFORE, Sony respectfully requests and moves that the Court set oral
4 argument upon the above-referenced motion.

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6 DATED: August 21, 2009

Respectfully submitted,

7 QUINN EMANUEL URQUHART OLIVER &
8 HEDGES, LLP

9 By/s/

10 Kevin P.B. Johnson
11 Attorneys for Sony Corporation

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